

**Joseph & Norinsberg LLC**

**Fighting for Employee Justice**



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300 N. New York Ave, Suite 832  
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Arjeta Albani, Esq.  
arjeta@norinsbergllaw.com

**VIA ECF**

Hon. Robyn F. Tarnofsky  
United States Magistrate Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, N.Y. 10007-1312

Date: 12/23/2024  
New York, NY

SO ORDERED

ROBYN F. TARNOFSKY  
UNITED STATES MAGISTRATE JUDGE

**Re: Tavon Turner v. The Treehouse Dispensary, Inc.,  
Case No. 1:24-cv-07994-DEH  
Response to Order to Show Cause**

Dear Judge Tarnofsky:

Our office represents Plaintiff Tavon Turner in the above-referenced matter. We write in response to the Court's Order dated December 20, 2024, requiring Plaintiff to show cause why an order should not be issued pursuant to Fed.R.Civ.P. 55, instructing Plaintiff to seek default judgment against Defendant for failure to defend this action. (ECF 9.) On December 17, 2024, this Honorable Court directed plaintiff to serve the previous order upon defendant no later than December 19th, 2024, and to file proof on the docket of such service on the same date.

I hereby certify that on December 17, 2024, our office served Your Honor's Order dated December 17, 2024, the Complaint and all other orders in this action by first-class certified mail, return receipt requested. A copy of the proof of service is annexed hereto as Exhibit "A". (see Ex. A) (Letterstream Job Completion)

We assure the Court that we are prepared to comply with all deadlines and procedures henceforth. Specifically, we will initiate the process to file a motion for Default Judgment against the Defendant if we do not hear from the Defendant on or before the January 9, 2025 deadline by which Your Honor extended Defendant's time to submit a written response to the Complaint.

Thank you for your understanding and consideration.

Respectfully submitted,

JOSEPH & NORINSBERG, LLC

Arjeta Albani, Esq.  
*Attorneys For Plaintiff*  
110 East 59<sup>th</sup> Street  
Suite 2300  
New York, New York 10022  
(212) 227-5700  
Fax No. (212) 656-1889  
arjeta@norinsberglaw.com

# EXHIBIT A

# INVOICE

Date	Invoice #
12/20/2024	10780546

**Jon L. Norinsberg, Esq., PLLC**  
**110 East 59th Street, Suite 2300**  
**New York, NY 10022**

Remit to address:

**LetterStream, Inc.**  
**PO Box 29900**  
**Department 937**  
**Phoenix AZ 85038-0900**

		Terms	Due Date	Rep
		PrePay	PrePaid	DP
Item	Description	Qty	Cost	Total
_Windowed Letter (Certified)	Windowed Express Letter - to be inserted into 3 window certified envelope and mailed	1	10.340	\$ 10.34
No Return Receipt	Return Receipt Not Included	1	-2.620	\$ -2.62
36 Sheets Inserted	8.5x11 20 lb Plain White Simplex Black print treehousemailing121724.pdf	1	4.320	\$ 4.32
Coversheet	8.5x11 Printed Coversheet	1	0.100	\$ 0.10
Extra Postage	6 additional ounces per piece	1	1.680	\$ 1.68
Flat Envelope	Upgraded to Flat Envelope due to number of items included	1	1.540	\$ 1.54
	MAILING DATE: 12/18/2024 JOB TITLE: My Mailing 12/17/2024 JOB TYPE: _Windowed Letter (Certified)			

**Thank you for your business.**

A 2% monthly charge will be levied on any past due balances. Customer agrees to pay all collection costs and attorney's costs and attorney's fees necessary to collect any past due amounts, as permitted by law. Failure to contact us promptly about discrepancies substantiates the charges.

<b>Total Charges</b>	<b>\$ 15.36</b>
<b>Total Due</b>	<b>\$ 0.00</b>

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